

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW HAMPSHIRE**

Richard MOLINA SANIPATIN, )  
Petitioner, )  
v. )      **Civil Action No. 25-cv-120-PB-TSM**  
Pamela BONDI, Attorney General, U.S. )  
Department of Justice; Kristi NOEM, )  
Secretary of the U.S. Department of )  
Homeland Security; Pete R. FLORES, )  
Acting Director, U.S. Customs and )  
Border Protection; Juan G. BERNAL, )  
Chief Patrol Agent of Houlton Sector; )  
Scott NICHOLS, Sr., Sheriff, Franklin )  
County Detention Center, )  
Respondents. )

**MOTION FOR LEAVE TO WITHDRAW**

Melissa A. Hewey hereby moves this Court for leave to withdraw as counsel for Petitioner Richard Molina Sanipatin. The reasons for this motion are as follows.

1. This case was initially filed in the District of Maine, case no. 1:25-cv-00107 and the undersigned was engaged to act as local counsel to lead counsel, Attorney JoAnn A. Dodge.
2. On March 31, 2025, this case was transferred from the District of Maine to the District of New Hampshire. ECF Doc. 6.
3. Attorney Dodge is admitted in the District of New Hampshire and has no need for local counsel.

4. Attorney Dodge has filed a notice of appearance on behalf of Plaintiff. ECF Doc. 8.

WHEREFORE, the undersigned respectfully requests leave to withdraw as counsel in this case.

Date: April 14, 2025

/s/ *Melissa A. Hewey*

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